

Torres, Francine

From: carolineranch@earthlink.net
Sent: Monday, September 04, 2006 11:57 AM
To: National List
Subject: NOP expansion of allowable substances in livestock production

Attachments: ATTACHMENT.TXT



ATTACHMENT.TXT

> Arthur Neal, Director of Program Administration National Organic
> Program, USDA-AMS-TMP-NOP

Dear Mr. Neal:

I'm commenting on the AMS proposal to allow an expanded list (below) of substances to be used in organic livestock production.

> Organic producers can ALWAYS treat an animal with anything they want,
> as long as they remove it from organic production and sell it through
> non-organic channels. Limiting the number of inputs forces organic
> producers to apply solid herd and pasture management techniques to
> keep their herds healthy, and rely on non-approved inputs only when
> absolutely necessary. An expanded list of "approved" inputs makes it
> easier to keep animals that should be culled, and rely on inputs from
> ailments commonly caused by overcrowding and stress (conditions which
> should NOT exist in organic production).

Besides, is it fair for one producer to take advantage of a whole list of inputs when others out there are trying to abide by the spirit of the OFPA by avoiding them? That sets up the whole issue of price as well. If a number of org. producers start relying on these "crutches", their cost of production goes down, bringing the pay price on organic meats down correspondingly. What does that do to the producer who's doing it all with sound management techniques and no inputs? His cost of production still remains high but he won't be able to get his price because his brother-producers are using allowable inputs. Even now without allowable "shortcuts", pay price on organic cattle isn't where it should be overall.

Based on what I've learned over the past 10 years about organic livestock production, I'd say the need for these substances is extremely remote in organic systems which practice sound organic livestock management techniques. These substances would end up being used as a crutch to prop up poor management systems, and yet another step toward that slippery slope of commodity organics. The only reason anyone is even proposing such an expansion of allowable inputs is because of the current shortage of organic meats to the marketplace. This is an effort to expand the number of animals that could qualify as "organic", and has no basis in need or consumer expectations.

Finally, do we really think that consumers want these products used on the animals they eat which are being labeled as organic? Consumers buy organic meats to avoid inputs commonly used in other production methods. It's enough that there's a gaping loophole in the standards concerning backpours already. For the organic label to mean anything in the marketplace, it has to at least come close to consumer expectations. This move would shoot honest-to-goodness organic producers in the foot. Already

I'm hearing from many consumers that they no longer trust the organic label and are buying "natural" (how incredulous is that!)

An expansion of allowable substances will only encourage and mask sloppy pasture and herd management practices. Let's keep these substances out of organic livestock production and retain the existing system of removing any treated animals from organic production.

PS: RE: Atropine -- I'd like to know how an organic animal contracts organophosphate poisoning in the first place. Wouldn't that animal need to be removed from organic production anyway, whether or not it was treated with atropine? As for most of the others, I don't believe ANY substance requiring a withdrawal period, regardless of how long, should EVER be allowed in organic production.

Sincerely,

Karalee Bancroft
Caroline Ranch
PO Box 632
Boulder MT 59632
(406) 225-4280
carolineranch@earthlink.net

Certified organic grass fed black Angus beef, certified organic pasture raised pork, certified organic grass fed bison, certified organic grass fed lamb, certified organic pasture raised poultry.

>

> -----

> -

> -----

> -

> -----

> -

> ----

>

>

> USDA's Agricultural Marketing Service is seeking comment on a proposed
> rule that would expand by eight the number of allowable substances
> used in treating livestock under the National Organic Program.

>

> Among the additions:

> ? Atropine: Used as an antidote for organophosphate poisoning,
> usually the result of exposure to pesticides. Atropine is an extract
> from the plant atropa belladonna. The NOP consulted with both EPA and
> FDA about the appropriateness of use of atropine and received
> approval.

> ? Bismuth subsalicylate: Used as an absorbant, anti-diarrhea drug, as
> well as for relief from stomach ulcers. FDA advised NOP that bismuth
> is approved for use in humans and could be approved for use in
> livestock.

> ? Butorphanol: Used as painkiller prior to surgery. This is in a
> class called opiate agonists, and is similar to morphine or fentanyl.
> It is a significant aid in pain relief, but wears off quickly. The
> National Organic Standards Board recommended use in organic livestock
> production, but specified that the period between last use and either

- > slaughter or sale of milk be twice as long as recommended by FDA. USDA
- > does not believe that extension of the withdrawal period is necessary.
- > ? Flunixin: Used in the treatment of inflammation or pyrexia.
- > Flunixin is non-narcotic and non-steroidal. It is a synthetic drug
- > which breaks down quickly and is removed from the body in urine.
- > Again, NOSB recommended a withdrawal period twice the length required
- > by FDA, and USDA disagreed.
- > ? Furosemide: Used for treatment of udder and pulmonary edema. It is
- > a diuretic. Again, NOSB accepted the drug but requested an extended
- > withdrawal period. USDA, again, disagreed on the necessity for such an
- > extension.
- > ? Magnesium hydroxide: For use as an antacid and laxative for use in
- > treatment of upset stomach and constipation. This is a naturally
- > occurring mineral.
- > ? Peroxyacetic/paracetic acid: Used for facility and processing
- > equipment sanitation and as a topical disinfectant on animals and meat
- > and dairy products. Approved by FDA as an indirect food additive.
- > ? Poloxalene: For treatment of bloat in cattle, it is a stool
- > softener, and can be used in emergency situations or as a preventative
- > as an addition to feed. It is synthetic. NOSB recommended that it be
- > approved only for emergency treatments; USDA wants it to be used for
- > preventative care as well.
- > Comments must be submitted by Sept. 15, 2006. They may be mailed to
- >
- > Arthur Neal, Director of Program Administration National Organic
- > Program, USDA-AMS-TMP-NOP 1400 Independence Ave., SW Room4008-So., Ag
- > Stop 0268 Washington, DC 20250
- > Fax: 202-205-7808
- >
- > Email: National.List@usda.gov
- >
- > Internet: www.regulations.gov
- >